

NH ELAP EPA 504.1 & EPA 524.2 FRB Policy Statement

*Compliance samples shall include a FRB(s) per the method requirement.

This requirement is based on the language found in the reference methods and on regulation and method interpretations received from the USEPA Drinking Water Program Staff (Cincinnati, OH).

Any applicable requirement found in a sampling agent QAPP shall be met by the laboratory.

The (*accredited*) laboratory shall demonstrate compliance with more stringent standards if required in a mandated test method or regulation (5.1.1).

The policies and procedures for reviews leading to a contract for environmental testing shall ensure that the requirements (*any requirement related to the proper performance of the analysis*), including the methods to be used, are adequately defined, documented and understood (5.4.4.1.a).

*Compliance samples (sample containers) submitted by another outside organization (i.e. an engineer firm or another lab) where no FRB(s) was included.

An accredited lab may not necessarily be responsible for the lack of a FRB in this situation. If a compliance sample does not include a FRB, if sample containers are of the wrong type, if the numbers of sample containers are inadequate to run the analysis or the sample preservation is improper in any manner: each of these situations needs to be addressed as part of the contract review process and at sample receipt with the sampling agent. The data needs to be qualified with a description of what requirement was not met.

The policies and procedures for reviews leading to a contract for environmental testing shall ensure that the requirements (*any requirement related to the proper performance of the analysis*), including the methods to be used, are adequately defined, documented and understood (5.4.4.1.a).

The laboratory shall have a written sample acceptance policy that clearly outlines the circumstances under which samples shall be accepted or rejected (5.5.8.3.2). Note: sampling instructions (how to take the sample) are not equivalent to a sample acceptance policy.

The laboratory shall demonstrate compliance with more stringent standards if required in a mandated test method or regulation (5.1.1).

Laboratories accredited to be in compliance with these standards (*2003 NELAC Standards*) shall certify that the test results meet all requirements of NELAC or shall provide reasons and / or justification if they do not (5.5.10.2.m).

*Non-compliance samples and the FRB requirement.

FRBs should be collected with either EPA 524.2 or EPA 504.1 samples.

In situations where an EPA 524.2 or an EPA 504.1 analysis will be performed on a non-compliance sample (i.e. a homeowner sample), one of the following conditions must be met prior to disregarding the addition of a FRB as part of the sample kit: the analysis shall be sold as a modified analysis (i.e. Modified EPA 524.2 or Modified EPA 504.1); the written contract between the lab and client will clearly indicate that no FRB will be included with the sample containers and the report will be qualified with this information or the lab shall not seek accreditation for these analyses.

The policies and procedures for reviews leading to a contract for environmental testing shall ensure that the requirements, including the methods to be used, are adequately defined, documented and understood (*between the lab & client*) (5.4.4.1.a).

Deviations from environmental test methods may occur only if the deviation has been documented, technically justified, authorized, and accepted by the client (5.5.4.1).

Laboratories accredited to be in compliance with these standards (*2003 NELAC Standards*) shall certify that the test results meet all requirements of NELAC or shall provide reasons and / or justification if they do not (5.5.10.2.m).